



September 4, 2015

BY ELECTRONIC & REGULAR MAIL

Aaron White, Esq.  
Boyle, Shaughnessy & Campo, P.C.  
695 Atlantic Avenue #11  
Boston, MA 02111

RE: *Christina Corda v. Suffolk County District Attorney's Office*  
U.S. District Court, District of Massachusetts, Civil Action No. 15-10628

Dear Aaron:

Enclosed is Ms. Corda's response to your client's second request for production of documents.

Sincerely,

A handwritten signature in black ink that appears to read "Stephen Churchill".

Stephen Churchill

Encl.

cc: Christine Corda

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 15-10628-RWZ

CHRISTINA CORDA, )  
Plaintiff )  
                )  
v.              )  
                )  
SUFFOLK COUNTY DISTRICT )  
ATTORNEY'S OFFICE,     )  
Defendant        )

**PLAINTIFF'S RESPONSE TO DEFENDANT'S  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

22. Please produce copies of any and all written correspondence, including emails, texts, and Facebook messages, from September 19, 2014 through September 22, 2014 exchanged between you and any other individual with whom you discussed any allegations contained in the Complaint.

RESPONSE: Ms. Corda objects to this request to the extent it requests communications that are not relevant to any party's claim or defense. Subject to this objection, Ms. Corda states that any responsive communications that are in her possession, custody, or control, and that are relevant to any party's claim or defense, have been or will be produced.

23. Please produce copies of any and all written correspondence, including emails, texts, and Facebook messages, from September 19, 2014 through September 22, 2014 exchanged between you and Caren Donovan.

RESPONSE: Ms. Corda objects to this request to the extent it requests communications that are not relevant to any party's claim or defense. Subject to this objection, Ms. Corda states that any responsive communications that are in her possession, custody, or control, and that are relevant to any party's claim or defense, have been or will be produced.

24. Please produce copies of any and all written correspondence, including emails, texts, and Facebook messages, from September 19, 2014 through September 22, 2014 exchanged between you and “Christine,” of which incomplete copies of correspondence have been already produced.

RESPONSE: Ms. Corda objects to this request to the extent it requests communications that are not relevant to any party’s claim or defense. Subject to this objection, Ms. Corda states that any responsive communications that are in her possession, custody, or control, and that are relevant to any party’s claim or defense, have been or will be produced.

25. Please produce copies of any and all written correspondence, including emails, texts, and Facebook messages, from September 19, 2014 through September 22, 2014 exchanged between you and Craig McClellan.

RESPONSE: Ms. Corda objects to this request to the extent it requests communications that are not relevant to any party’s claim or defense. Subject to this objection, Ms. Corda states that any responsive communications that are in her possession, custody, or control, and that are relevant to any party’s claim or defense, have been or will be produced.

26. Please produce copies of any and all written correspondence, including emails, texts, and Facebook messages, from September 19, 2014 through July 1, 2015 exchanged between you and Kate Lagana relating to the incident that occurred on September 19, 2014, your termination on September 22, 2014, and the District Attorney’s investigation of the allegations of the plaintiff.

RESPONSE: Ms. Corda objects to this request to the extent it requests communications that are not relevant to any party’s claim or defense. Subject to this objection, Ms. Corda states

that any responsive communications that are in her possession, custody, or control, and that are relevant to any party's claim or defense, have been or will be produced.

27. Please produce copies of any and all written correspondence, including emails, texts, and Facebook messages, from September 19, 2014 through September 22, 2014 exchanged between you and Matt Feeney.

RESPONSE: Ms. Corda objects to this request to the extent it requests communications that are not relevant to any party's claim or defense. Subject to this objection, Ms. Corda states that any responsive communications that are in her possession, custody, or control, and that are relevant to any party's claim or defense, have been or will be produced.

28. Please produce copies of all written correspondence, including emails, text messages, and Facebook messages, from September 19, 2014 through January 1, 2015 exchanged between you and Rilwan Adedutan, concerning the plaintiff's employment with the defendant, the incident that occurred on September 19, 2014, plaintiff's termination, plaintiff's MCAD Complaint, and the Complaint filed in Federal Court.

RESPONSE: Ms. Corda objects to this request to the extent it requests communications that are not relevant to any party's claim or defense. Subject to this objection, Ms. Corda states that any responsive communications that are in her possession, custody, or control, and that are relevant to any party's claim or defense, have been or will be produced.

29. Please produce copies of any and all written correspondence, including emails, texts, and Facebook messages, from September 19, 2014 through September 22, 2014 exchanged between you and Sarah McAvoy.

RESPONSE: Ms. Corda objects to this request to the extent it requests communications that are not relevant to any party's claim or defense. Subject to this objection, Ms. Corda states

that any responsive communications that are in her possession, custody, or control, and that are relevant to any party's claim or defense, have been or will be produced.

30. Please produce copies of any and all written correspondence, including emails, texts, and Facebook messages, from September 19, 2014 through September 22, 2014 exchanged between you and Jen O'Keefe.

RESPONSE: Ms. Corda objects to this request to the extent it requests communications that are not relevant to any party's claim or defense. Subject to this objection, Ms. Corda states that any responsive communications that are in her possession, custody, or control, and that are relevant to any party's claim or defense, have been or will be produced.

CHRISTINA CORDA,  
By her attorney,



Stephen Churchill, BBO # 564158  
FAIR WORK, P.C.  
192 South Street, Suite 450  
Boston, MA 02111  
(617) 607-3260  
[steve@fairworklaw.com](mailto:steve@fairworklaw.com)

Dated: September 4, 2015

**CERTIFICATE OF SERVICE**

I certify that I served, by regular and electronic mail, a copy of the foregoing document on all counsel of record.

Dated: September 4, 2015

  
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Stephen Churchill